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6
7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 *****

10 PAMELA DITTMAR,

11 Plaintiff,

12 v.

13 CITY OF NORTH LAS VEGAS, a municipal
14 corporation,

15 Defendant.

Case No. 2:17-cv-02916-JAD-PAL

**STIPULATION TO EXTEND
DEADLINE FOR PLAINTIFF TO
FILE HER AMENDED COMPLAINT
TO FURTHER CONFER ON
PLAINTIFF'S CLAIMS**

(First Request) ECF No. 23

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17 Counsel for Plaintiff, Melanie A. Hill of Melanie Hill Law PLLC, and counsel for Defendant,
18 R. Todd Creer and Kaitlin H. Paxton of the law firm of Kamer Zucker Abbott, respectfully submit
19 the following stipulation to extend the deadline for Plaintiff to file her amended complaint to further
20 meet and confer on Plaintiff's amended claims. The parties make this joint request to extend the
21 deadline for Plaintiff to file her amended complaint to allow the parties additional time meet and
22 confer on the claims Plaintiff will pursue in her amended complaint and meaningfully discuss the
23 arguments raised in Defendant's Motion to Dismiss [ECF No. 8] that was denied without prejudice
24 "to the City's right to reurge it after Dittmar files her amended complaint." [ECF No. 14].

- 25 1. Plaintiff Pamela Dittmar received her right to sue letter from NERC/EEOC for her
26 second charge of discrimination filed with the Nevada Equal Rights Commission
27 ("NERC") on or about July 23, 2018.
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1 2. Counsel for both parties are requesting additional time to meaningfully meet and confer
2 and allow Defendant City of North Las Vegas to review Plaintiff's draft amended
3 complaint before it is filed in an attempt to work out any legal issues to eliminate the
4 need to file a new motion to dismiss.

5 3. The requested extension is not for purposes of delay, but to avoid unnecessary litigation
6 or the wasting of resources and expense on issues that can be resolved between the
7 parties or through further amendment of the complaint before it is filed.

8 WHEREFORE, the parties respectfully request that the Court extend Plaintiff's deadline to
9 file her amended complaint two weeks until September 7, 2018.

10 DATED this 24th day of August, 2018.


11 MELANIE HILL LAW PLLC

KAMER ZUCKER ABBOTT

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22 **IT IS SO ORDERED.**

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U.S. District Judge Jennifer A. Dorsey
August 27, 2018